

236459

ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419

May 1, 2012

Ms. Jocelyn Boyd
Chief Clerk
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

RECEIVED
2012 MAY - 1 PM 12:32
SC PUBLIC SERVICE
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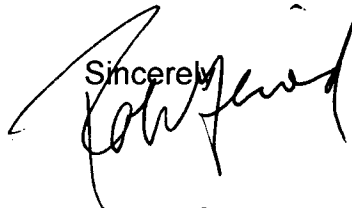
In Re: Petition of South Carolina Electric & Gas Company for Updates and Revisions to
Schedules Related to the Construction of a Nuclear Base Load Generation
Facility at Jenkinsville, South Carolina
Docket No. 2012-90-E

Dear Ms. Boyd::

Enclosed please find for filing and consideration the Petition to Intervene by
Sierra Club in the above docket, together with Certificate of Service reflecting service
upon all parties of record.

With kind regards I am

Sincerely,



Robert Guild

Encl.s
CC: All Parties

RETURN DATE: OK
SERVICE: OK

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-90-E

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In Re: Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina)
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**PETITION TO INTERVENE BY
SIERRA CLUB**

The Sierra Club, on behalf of its members who will be adversely affected by the approval of the subject Application, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding. In support of this Petition, Sierra Club would respectfully show:

1. The Sierra Club is the oldest and largest non-profit grassroots environmental organization in the world with some 750,000 members, 65 Chapters, over 400 local groups. The South Carolina Chapter has nine local groups with more than 5,000 members across the state. The Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. The Club and its members actively promote safe energy solutions

including energy efficiency and renewable energy resources to combat the climate crisis and to protect human health and the natural environment. The organization has been actively involved in a variety of issues involving nuclear power production and nuclear waste disposal in South Carolina. The South Carolina Chapter of the Club has offices and meeting space at 1314 Lincoln Street #211, Columbia, South Carolina 29301. Members of the Sierra Club are customers of SCE&G who live, work, recreate and use natural resources near the existing Summer nuclear plant and the site of the proposed Summer reactors.

2. Members of the Sierra Club would be harmed by the approval of the subject Application because of unwarranted increases in their electric rates, reduced reliability of their electric service, the displacement of environmentally superior energy efficiency and renewable energy production alternatives, the risk to their health and safety from routine and accidental releases of radiation, and harm to their use and enjoyment of natural resources which will be adversely affected by the approval of this Application, the subsequent costs associated with this project, and the construction and operation of the proposed nuclear facility.

3. Sierra Club is informed and believes that the construction schedule delays and the capital cost schedule increases proposed by South Carolina Electric & Gas Company are material and adverse deviations from the approved schedules which the utility failed to anticipate or avoid; and which are, therefore, the result of imprudence on the part of the utility, considering the information available at the time the utility could have acted to avoid the deviation or minimize its effect, all contrary to S.C. Code Sections 58-33-270(E) and 58-33-275(E).

WHEREFORE: For the foregoing reasons, Sierra Club, on behalf of its members who will be adversely affected by the approval of the subject Application, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding; to permit full discovery and disclosure of the information bearing on the deviations from the approved construction and capitol cost schedules; and to determine, on the basis of such information, that the subject application should be denied due to the imprudence of the utility, South Carolina Electric & Gas Company.

A handwritten signature in black ink, appearing to read "Robert Guild", is written over a horizontal line.

Robert Guild
314 Pall Mall
Columbia, South Carolina 29201
(803) 252 1419
ATTORNEY FOR SIERRA CLUB

May 1, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the above Petition to Intervene by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

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Columbia, SC, 29205

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